

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IT IS SO ORDERED.
s/ Dan Aaron Polster
DAN AARON POLSTER
U.S. DISTRICT JUDGE
Dated: 12/16/2024

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

City of Rochester v. Purdue Pharma L.P.,
No. 19-op-45853 (Track 12)

MDL 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS OPPOSITION TO
THE PBM DEFENDANTS' OBJECTION TO THE SPECIAL MASTER'S ORDER
REGARDING THE PRODUCTION OF PERSONNEL FILES**

This is a motion under Local Rule 5.2 seeking leave to file under seal Plaintiff's Opposition to the PBM Defendants' Objection to Special Master Cohen's December 6 ruling regarding the production of personnel files, together with its supporting exhibits. A proposed order is attached to this motion as Exhibit 1.

Local Rule 5.2 provides, "No document will be accepted for filing under seal unless a ... court order authorizes the filing of sealed documents." Plaintiff's Opposition refers information about defendants' employees and former employee deponents, which may be considered by the PBM Defendants as confidential under the governing protective order. *See* ECF Nos. 441, 1357, 2688. Accordingly, this information is subject to the Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal. *See* ECF No. 1813.

Plaintiff does not believe this information warrants sealing and withholding from the public. Nonetheless, Plaintiff seeks to comply with all applicable orders concerning confidential information. Plaintiff respectfully requests to proceed in this manner so there is no inadvertent disclosure of such